EXHIBIT A – P.R. 4-5(d) CLAIM CONSTRUCTION CHART

I. U.S. Pat. No. 6,819,923

	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction[1]	Court's Construction
1.	"means for receiving a neighbor cell information message" (cl. 11)	[**PARTIALLY AGREED**]: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "receiving a neighbor cell information message." **[DISPUTED]**: Structure: an antenna, a receiver, and a microprocessor (1:34-47; 2:4-7; 6:19-61; Fig. 7), and equivalents thereof (no special algorithm required)	[**PARTIALLY AGREED**]: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "receiving a neighbor cell information message." **[DISPUTED]**: Indefinite Structure: no corresponding structure (algorithm) disclosed	This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is "receiving a neighbor cell information message."

[1] Defendants consist of AT&T Mobility LLC, HTC Corporation, HTC America, Inc., Exedea, Inc., Sprint Solutions, Inc., Sprint Spectrum L.P., Boost Mobile, LLC, Dell Inc., T-Mobile USA, Inc., T-Mobile US, Inc., Pantech Co., Ltd., Pantech Wireless, Inc., LG Electronics, Inc., LG Electronics USA, Inc., Amazon.com, Inc., Microsoft Corporation, Cellco Partnership d/b/a Verizon Wireless, ZTE USA, Inc., and Apple Inc. Each Defendant proposes constructions only with respect to the claims asserted against that Defendant.

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	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction[1]	Court's Construction
2.	"means for associating a specific value of said set of specific parameter values indicated by one of said index with the corresponding second parameter of a neighbor cell" (cl. 11)	[**PARTIALLY AGREED**]: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "associating a specific value of said set of specific parameter values indicated by one of said index with the corresponding second parameter of a neighbor cell." [**DISPUTED**]: Structure: a microprocessor (6:57-61; Fig. 7) configured to use a parameter (or set of parameters) specified by an index (or pointer) for a parameter of a neighbor cell (2:15-28; 2:35-43; 3:4-26; 4:11-5:17; 5:35-46; 7:39-49; Figs. 2-5), and equivalents thereof	**[PARTIALLY AGREED]**: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "associating a specific value of said set of specific parameter values indicated by one of said index with the corresponding second parameter of a neighbor cell." [**DISPUTED**]: Indefinite Structure: no corresponding structure (algorithm) disclosed	This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is "associating a specific value of said set of specific parameter values indicated by one of said index with the corresponding second parameter of a neighbor cell."

EXHIBIT A – P.R. 4-5(d) CLAIM CONSTRUCTION CHART

II. U.S. Pat. No. 6,810,019

	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
3.	"processing means for arranging gaps in a time-slot frame according to the measurement pattern definitions" (cl. 11)	[**PARTIALLY AGREED**]: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "arranging gaps in a time-slot frame according to the measurement pattern definitions." [**DISPUTED**]: Structure: a processor, controller, or application specific integrated circuit (10:34-52; Fig. 6) configured to apply transmission gap length (TGL), transmission gap distance (TGD), transmission gap pattern length (TGPL), and/or transmission gap period repetition count (TGPRC) parameters (5:53-67; 6:1-19; 6:20-7:3; 7:31-9:5; Fig. 3; Fig. 4A; Fig. 4B; Fig. 5), and equivalents.	[**PARTIALLY AGREED**]: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "arranging gaps in a time-slot frame according to the measurement pattern definitions." [**DISPUTED**]: Indefinite Structure: no corresponding structure (algorithm) disclosed	This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "arranging gaps in a time-slot frame according to the measurement pattern definitions."

EXHIBIT A – P.R. 4-5(d) CLAIM CONSTRUCTION CHART

	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
4.	"the processing means are also arranged to set for the measurement pattern definition a delay according to the measurement pattern definition" (cl. 11)	[**PARTIALLY AGREED**]: This is a means-plus function element to be construed in accordance with 35 U.S.C. § 112(6). Function: set[ting] for the measurement pattern definition a delay according to the measurement pattern definitions [**DISPUTED**]: Structure: a processor, controller, or application specific integrated circuit (10:34-52; Fig. 6) configured to apply a connection frame number (CFN) and transmission gap starting slot number (TGSN) parameter combination specific to the terminal (5:46-53; 6:1-19; 7:4-30; 7:31-9:5; Fig. 5), and equivalents.	[**PARTIALLY AGREED**]: This is a means-plus-function element to be construed in accordance with 35 U.S.C. § 112(6). Function: "set[ting] for the measurement pattern definition a delay according to the measurement pattern definitions" [**DISPUTED**]: Indefinite Defendants propose the following construction for the function: "adapt the value of the delay in the measurement pattern definition according to the measurement pattern definitions" Structure: no corresponding structure (algorithm) disclosed	This is a means-plus-function element to be construed in accordance with 35 U.S.C. § 112(6). The function is: "set[ting] for the measurement pattern definition a delay according to the measurement pattern definitions"

III. U.S. Pat. No. 7,941,174

	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
5.	"determining a transmit power difference which is to be maintained by the subscriber station between on one hand a total maximum transmit power of the subscriber station for the codes and on another hand a total transmit power of the subscriber station for the codes at a start of a message transmission using a first one of the codes" (cl. 1) / "maintaining a previously determined transmit power difference by the subscriber station between on one hand a total maximum transmit power of the subscriber station for the codes and on another hand a total transmit power of the subscriber station for the codes at a start of a message transmission using a first one of the codes" (cl. 9) / "determine a transmit power difference which is to be maintained by the subscriber station between on one hand a total maximum transmit power of the subscriber station for the codes and on another hand a total transmit power of the subscriber station for the codes at a start of a message transmission using a first one of the codes" (cl. 18)	Not indefinite	Indefinite	

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	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
6.	"a transmit power difference which is to be maintained" (cl. 1, 18) / "maintaining a previously determined transmit power difference" (cl. 9)	Plain and ordinary meaning; no construction necessary.	"an unused transmit power that is required to exist"	

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IV. U.S. Pat. No. 8,055,820

	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
7.	"wherein the designating designates the long buffer status reporting format when there is sufficient uplink bandwidth to communicate using the long buffer status reporting format" (Claim 1) / "wherein the designating unit is configured to designate the long buffer status reporting format when there is sufficient uplink bandwidth to communicate using the long buffer status reporting format" (cl. 12)	Not indefinite	Indefinite	

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	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
8.	"the designating unit" (cl. 12)	"the memory, processor, and computer program code configured to designate" (not subject to 112(6)). Alternatively, should the Court determine this is a means-plus-function claim element subject to 35 U.S.C. 112(6): Function: "designating the long buffer status reporting format when there is sufficient uplink bandwidth to communicate using the long buffer status reporting format" Structure: a VLSI circuit, semiconductor, or processor (7:15-24, FIG. 2) configured to assign a buffer status reporting format depending on the preselected condition detected and uplink bandwidth, and/or buffer priority (FIGS. 2-4; 6:1-42; 7:58-8:1; 8:17-39; 10:29-44), and equivalents	Indefinite This is a means-plus-function element to be construed in accordance with 35 U.S.C. § 112(6). Function: "designat[ing] the long buffer status reporting format when there is sufficient uplink bandwidth to communicate using the long buffer status reporting format." Structure: no corresponding structure disclosed	

V. U.S. Pat. No. 7,218,923

	Disputed Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
9.	"a diverting unit configured to divert a message of the messages sent from the application program and destined for the communication network" (cl. 24)	Plain and ordinary meaning; no construction necessary.	"a diverting unit configured to redirect a message of the messages sent from the application program and destined for the communication network from the path it would have taken if not redirected on to an alternate path"	
10.	"based on the message" (cl. 24)	Plain and ordinary meaning; no construction necessary.	"based on the contents of the message"	